

GIA N. MARINA  
Nevada Bar No. 15276  
**CLARK HILL PLLC**  
1700 South Pavilion Center Drive, Suite 500  
Las Vegas, Nevada 89135  
E-mail: [gmarina@clarkhill.com](mailto:gmarina@clarkhill.com)  
Telephone: (702) 862-8300  
Facsimile: (702) 778-9709  
*Attorney for Defendant*  
*National Consumer Telecom & Utilities*  
*Exchange, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LYNN WILLIAMS,

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,  
IC.; EQUIFAX INFORMATION SERVICES  
LLC; NATIONAL CONSUMER TELECOM &  
UTILITIES EXCHANGE, INC., CLARITY  
SERVICES, INC.; and OWEN LOAN  
SERVICING, LLC,

Defendants.

**Case No. 2:24-cv-02293-JCM-EJY**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE, INC. TO FILE ANSWER**

**FIRST REQUEST**

Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or otherwise respond to the Complaint in this action is extended from April 28, 2025 through and including **May 28, 2025**. The request was made by NCTUE so that it can have an opportunity to

//

1 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff  
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 15<sup>th</sup> day of April, 2025.

4  
5 CLARK HILL PLLC

6 By: /s/ Gia N. Marina

Gia N, Marina

7 1700 South Pavilion Center Drive, Suite 500

Las Vegas, Nevada 89135

8 Telephone: (702) 862-8300

9 Facsimile: (702) 778-9709

Email: gmarina@clarkhill.com

10 *Attorney for Defendant National Consumer*

*Telecom & Utilities Exchange, Inc.*

**No opposition**

/s/ Gerardo Avalos

George Haines, Esq.

Nevada Bar No. 9411

Gerardo Avalos

Nevada Bar No. 15171

FREEDOM LAW GROUP

8985 S. Eastern Ave., Suite 350

Henderson, NV 89123

Phone: (702) 880-5554

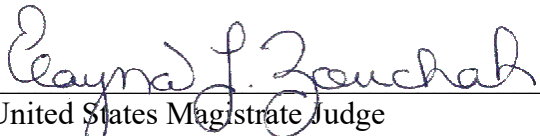
Fax: (702) 385-5518

Email: ghaines@freedomlegalteam.com

Email: gavalos@freedomlegalteam.com

*Attorneys for Plaintiff*

11  
12  
13  
14  
15  
16  
17 IT IS SO ORDERED:

18   
19 United States Magistrate Judge

20 DATED: April 16, 2025  
21  
22  
23  
24  
25  
26  
27  
28